January 6, 2006

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., TW-A325
Washington, DC 20554

**Notice of
Ex Parte Presentation**

Re: CC Docket No. 01-92

Dear Ms. Dortch:

On January 5, 2006, Albert H. Kramer and Robert F. Aldrich of Dickstein Shapiro Morin & Oshinsky, on behalf of the American Public Communications Council ("APCC"), met with the following staff of the Wireline Competition Bureau: Pricing Policy Division Chief Tamara Preiss, Deputy Division Chief Steve Morris, Deputy Division Chief Deena Shetler, Assistant Division Chief Judith Nitsche, and Randy Clarke. We discussed the problems posed for the payphone compensation process when toll-free numbers dialed at payphones are translated into POTS numbers and terminated as intraLATA communications. The attached diagrams were handed ouit and used to illustrate the problems.
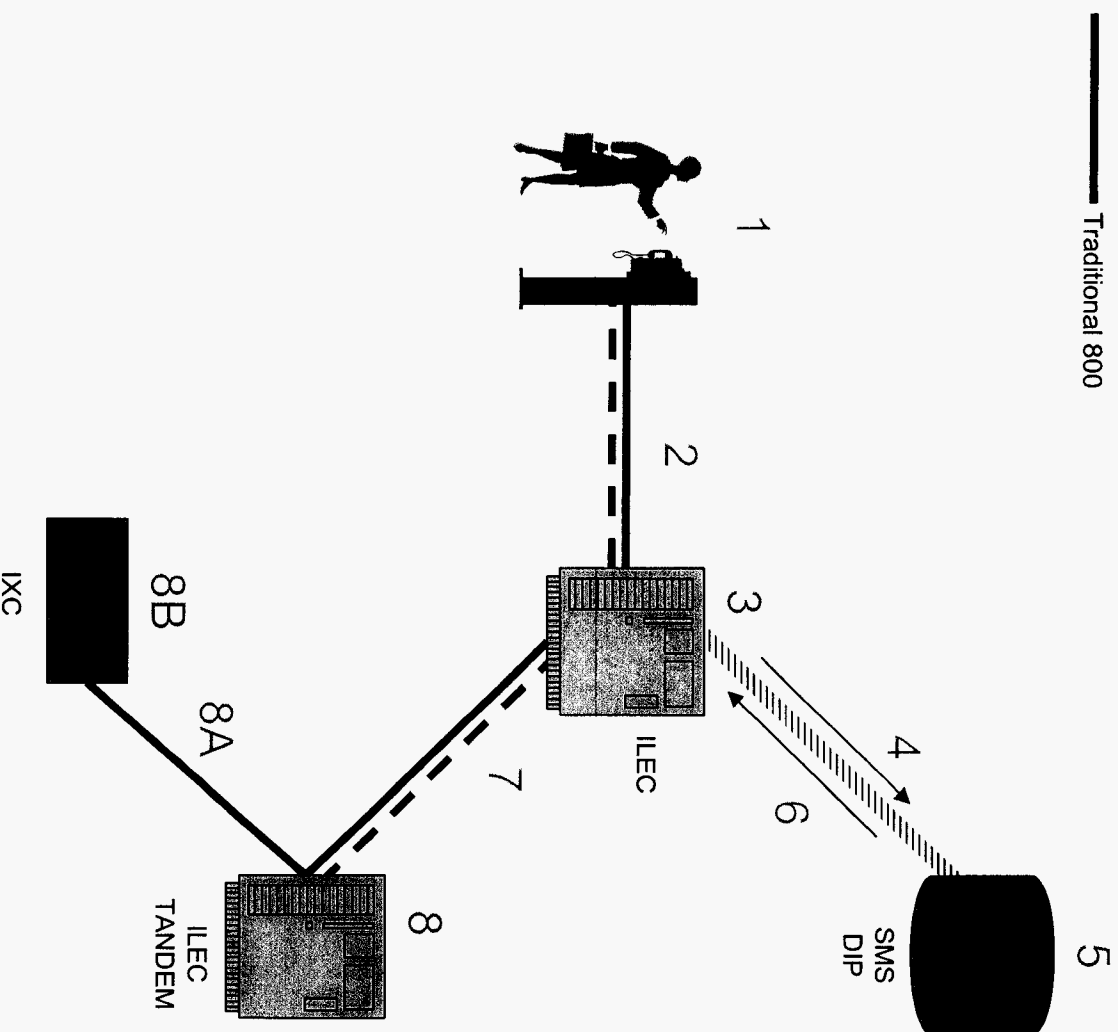
Sincerely,
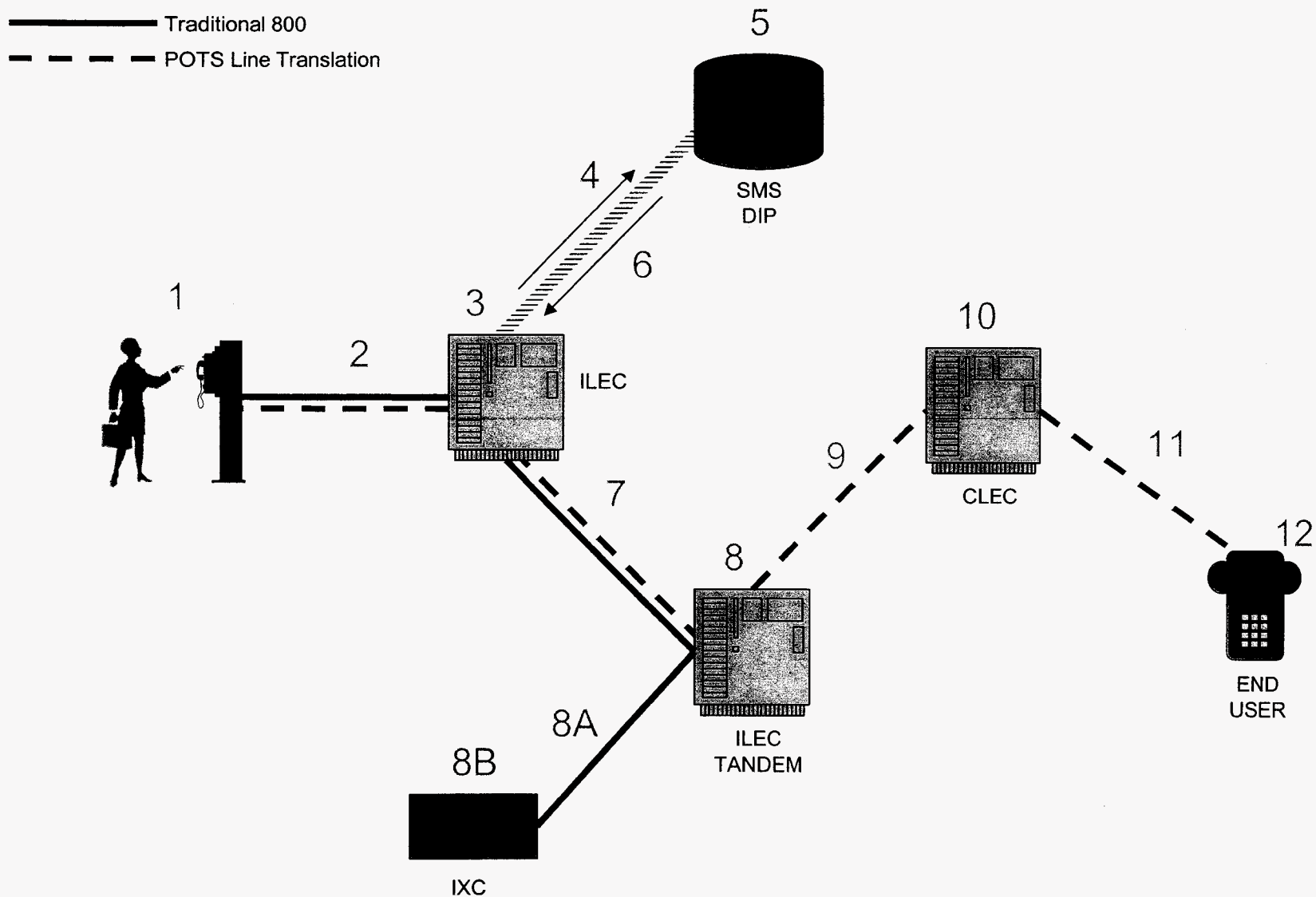
Robert F. Aldrich

cc: Tamara Preiss
        Steve Morris
        Deena Shetler
        Judith Nitsche
        Randy Clarke

Termination to CLEC End User/Customer

Traditional 800

1

2

3 ILEC

4

6

5 SMS DIP

7

8 ILEC TANDEM

8A

8B IXC

Termination to CLEC End User/Customer

Traditional 800

POTS Line Translation

5

SMS
DIP

4

6

3

1

2

ILEC

10

9

7

CLEC

11

8

12

8A

8B

ILEC
TANDEM

END
USER

IXC

2

1963998

DICKSTEIN
SHAPIRO
MORIN &
OSHINSKY

Traditional 800

POTS Line Translation

Termination to CLEC End User/Customer

5

SMS DIP

4

6

1

3

2

ILEC

10

CLEC

9

11

7

8

12

8A

ILEC TANDEM

END USER

8B

IXC
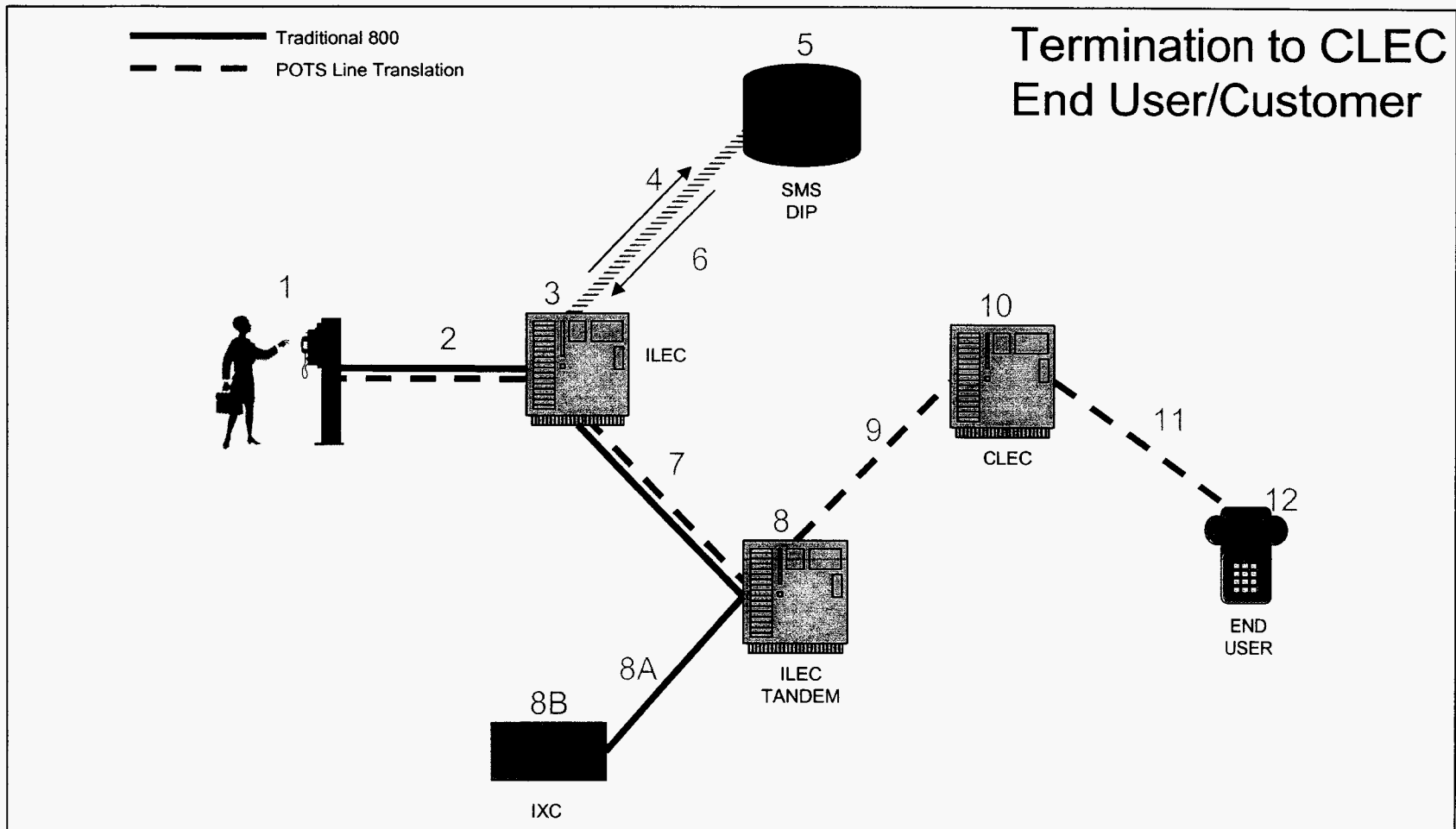
1. When is data field populated with ANI II code?

2. If prior to SMS dip, is 24/25 substituted in ANI II code digit field?

3. If not prior to SMS dip, is 24/25 inserted in ANI II code digit field after the dip?

4. Does 24/25 code go to CLEC (10)?

    - Does it reach tandem (8)?

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Termination to ILEC End User/Customer

Traditional 800

POTS Line Translation

5

SMS
DIP

4

6

1

2

3

ILEC

10

ILEC

11

9

7

8

8A

8B

ILEC
TANDEM

12

END
USER

IXC

DICKSTEIN
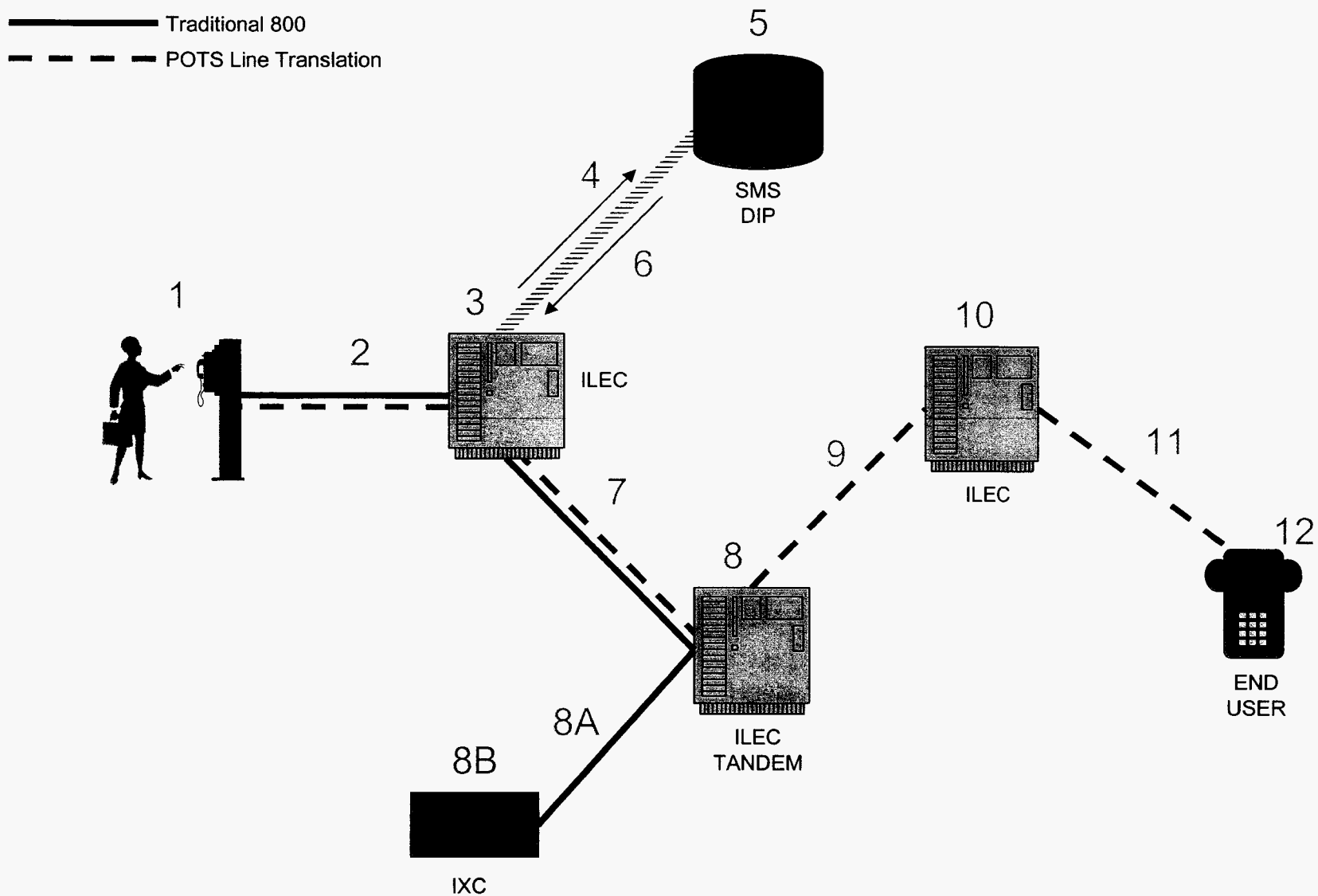SHAPIRO
MORIN &
OSHINSKY

4

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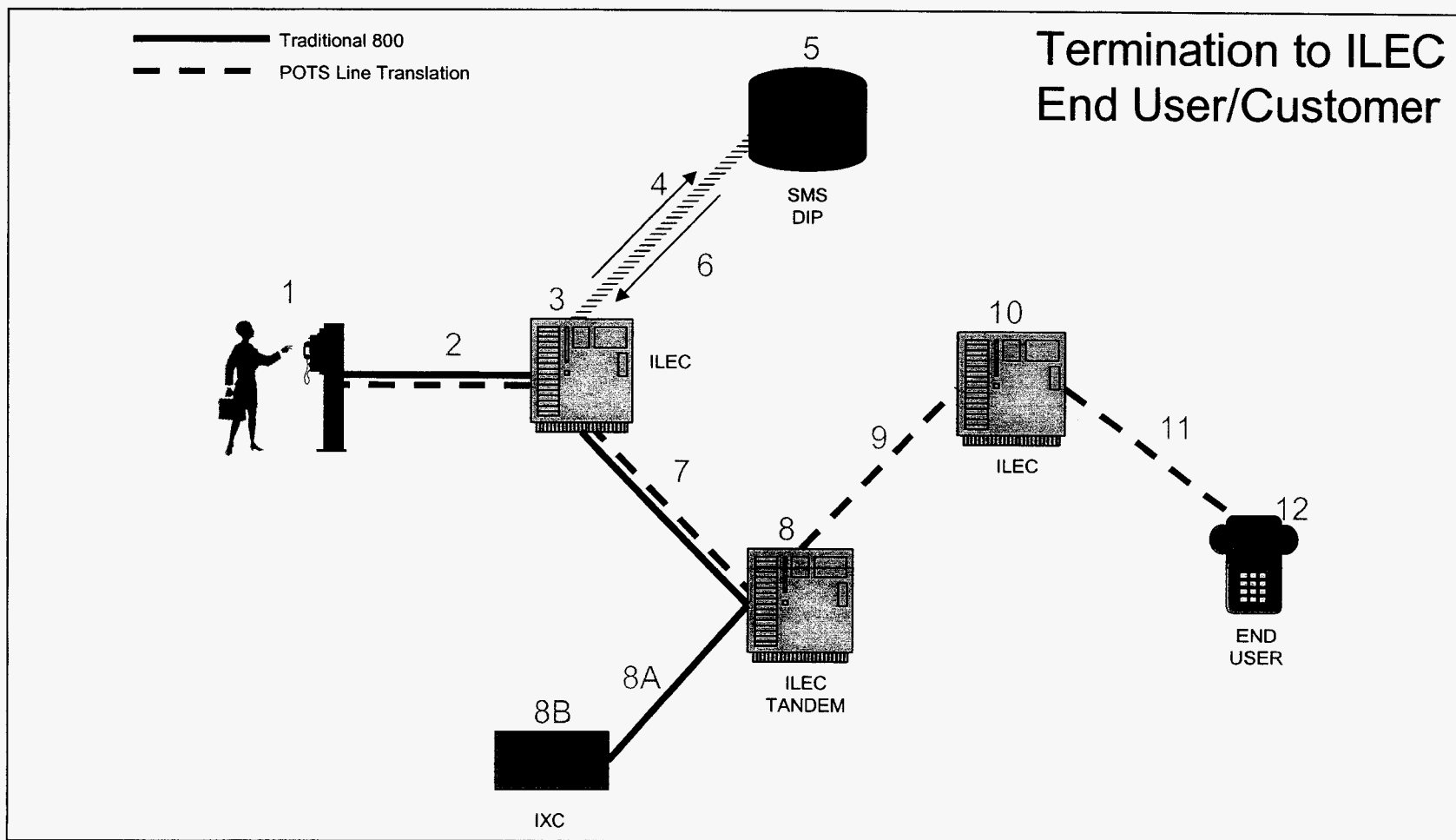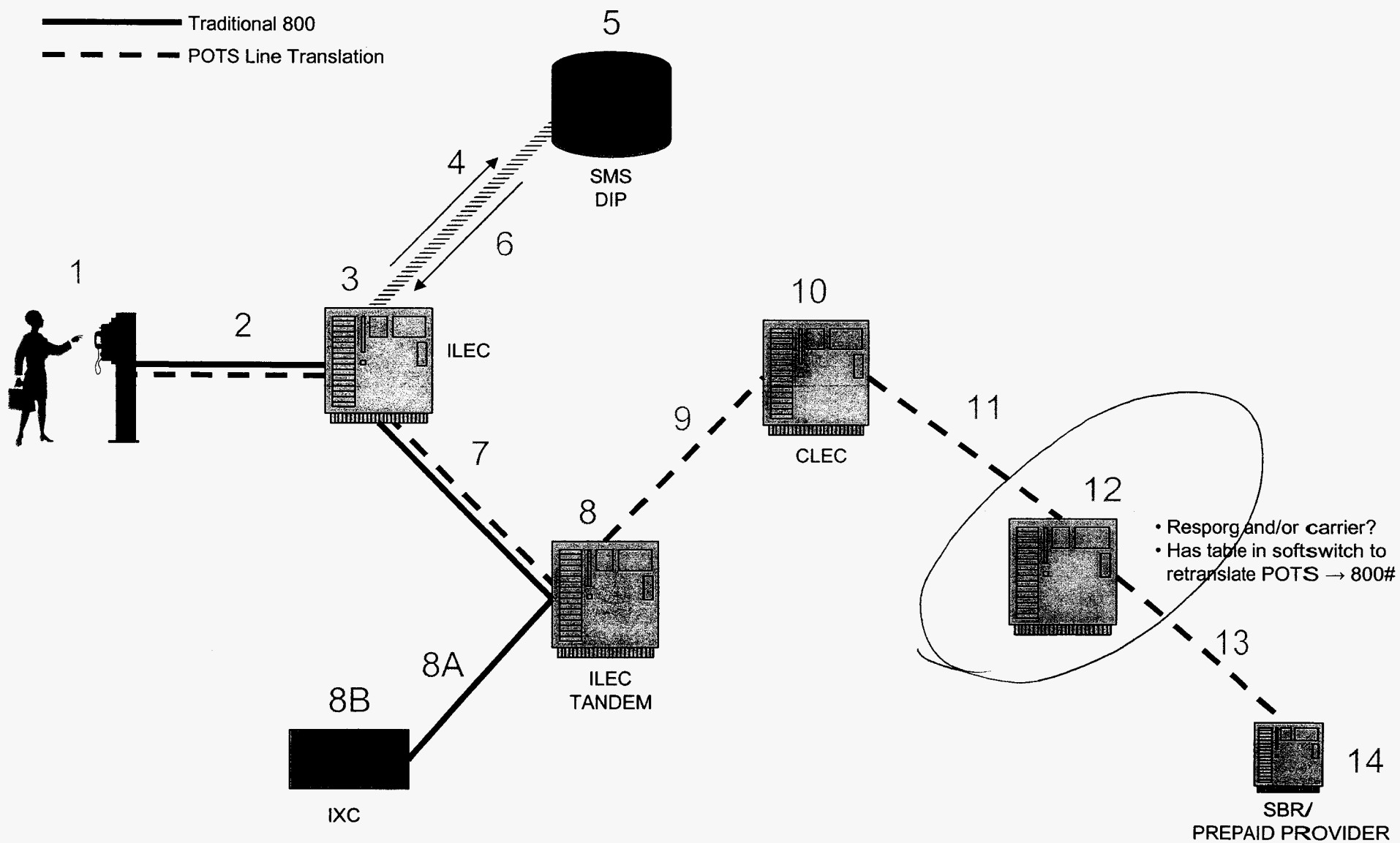Termination to ILEC End User/Customer

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4. Does 24/25 code go to ILEC (10)?

      - Does it reach tandem (8)?

Beyond the LATA

Traditional 800

POTS Line Translation

5

SMS DIP

4

6

1

2

3

ILEC

10

CLEC

11

9

7

8

12

- Resporg and/or carrier?
- Has table in softswitch to retranslate POTS → 800#

8A

ILEC TANDEM

8B

13

IXC

14

SBR/ PREPAID PROVIDER

6

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Beyond the LATA

Legend:
- ───── Traditional 800
- ‒ ‒ ‒ POTS Line Translation

- Resporg and/or carrier?
- Has table in softswitch to retranslate POTS → 800#

Labels in diagram: 5 SMS DIP, 1, 2, 3 ILEC, 4, 6, 7, 8 ILEC TANDEM, 8A, 8B IXC, 9, 10 CLEC, 11, 12, 13, 14 SBR/PREPAID PROVIDER
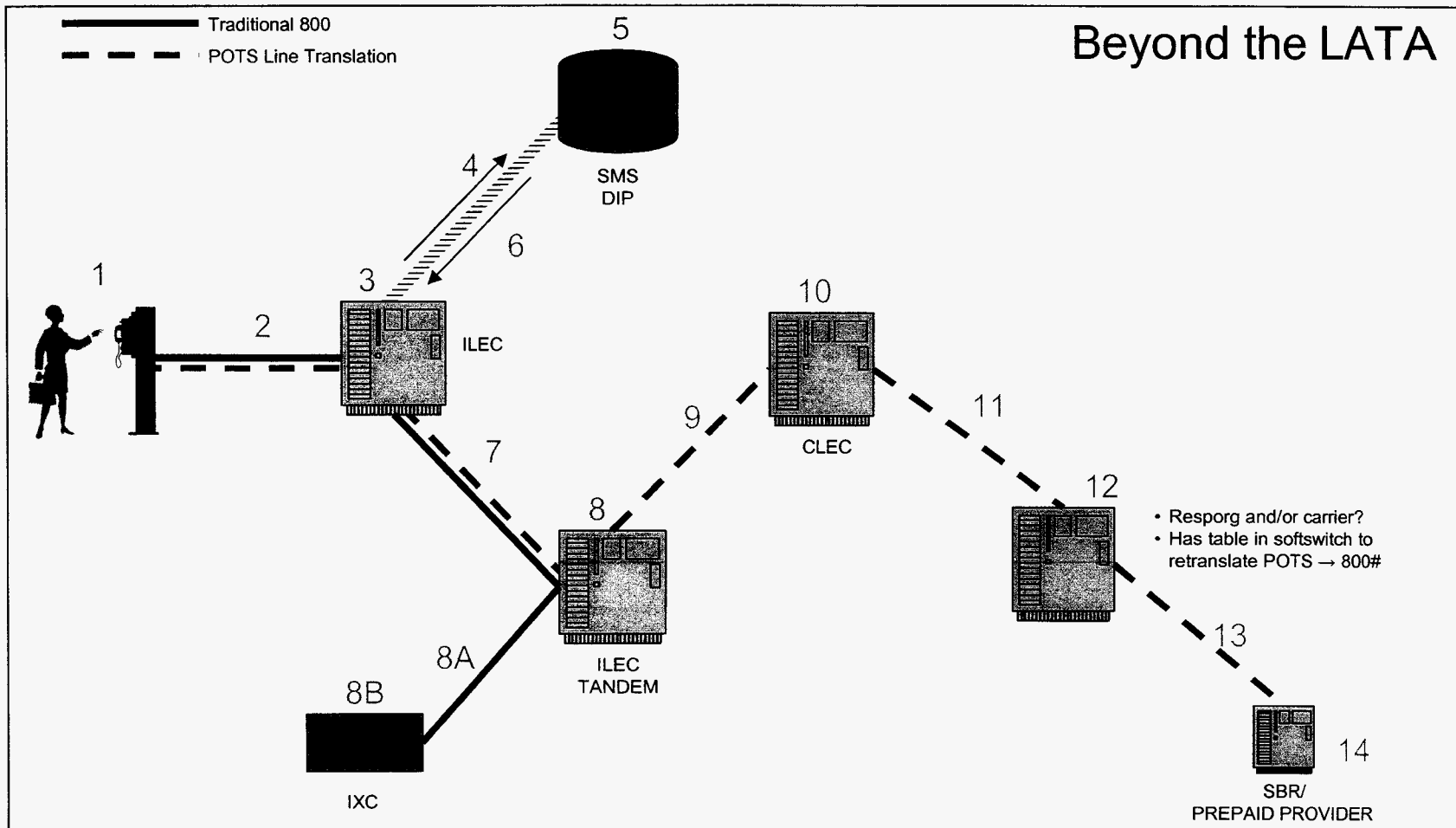
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   - Does it reach tandem (8)?

   - Does it reach resporg (12)?

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DICKSTEIN SHAPIRO MORIN & OSHINSKY